

EXHIBIT F

Bruce Scott, Jr.

December 10, 2019

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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UGOCHUKWU GOODLUCK NWAUZOR,)	
FERNANDO AGUIRRE-URBINA,)	
individually and on behalf of)	
all those similarly situated,)	
)	
Plaintiffs,)	
)	No. 17-cv-05769-RJB
vs.)	
)	
THE GEO GROUP, INC., a Florida)	
corporation,)	
)	
Defendant.)	

VIDEO DEPOSITION UPON ORAL EXAMINATION OF
BRUCE A. SCOTT, JR.
AS A RULE 30(b)(6) DESIGNEE OF
THE GEO GROUP, INC.

810 Third Avenue, Suite 500
Seattle, Washington

DATE: Tuesday, December 10, 2019

REPORTED BY: Donald W. McKay, RMR, CRR, CCR 3237

A P P E A R A N C E S

FOR THE PLAINTIFFS:

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REBECCA J. ROE, ESQ.
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ALSO PRESENT:

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LINDSEY LEWIS
Videographer

1 I N D E X

2 EXAMINATION BY PAGE

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4 MR. WHITEHEAD..... 6

6 E X H I B I T S

7 NUMBER DESCRIPTION PAGE

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9 Exhibit 353 Plaintiffs' Amended Notice of 9
Videotaped Rule 30(b)(6) Deposition
to The GEO Group

10 Exhibit 354 GEO's Fed. R. Civ. P. 26(a)(1) Initial 13
11 Disclosures

12 Exhibit 355 Untitled spreadsheets 23
13 (GEO-Nwauzor 084666)

14 Exhibit 356 Contract - Statement of Work 32

15 Exhibit 357 Defendant The GEO Group, Inc.'s 43
Responses to Plaintiff Chao Chen's
16 First Interrogatories and Requests
for Production

17 Exhibit 358 Composite - Billing from The GEO Group 55
18 to DHS ICE

19 Exhibit 359 Monthly Voluntary Worker Program 61
Spend - 2005-2016

20 Exhibit 360 Spreadsheet titled Northwest ICE 64
21 Processing Center Facility Financial
Statements

22 Exhibit 361 Performance-based National Detention 93
Standards 2011

23 Exhibit 362 Batch Listing - Batch No. 3683 - 96
24 04/18/2006

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4	Exhibit 363	Memorandum dated April 12, 2012, to	104
5		Associate Warden McHatton from	
6		Classification, Singleton and Heye,	
7		re: Voluntary Work Program 2011 PBNDS	
8		Standards	
9	Exhibit 364	E-mail chain dated August 30, 2014,	106
10		to Lowell Clark from Bill McHatton,	
11		re: Voluntary Work Program	
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13	Exhibit 365	Letter dated May 30, 2018, to Peter	110
14		Edge from (redacted)	
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1 Seattle, Washington; Tuesday, December 10, 2019

2 10:13 a.m.

3

4 THE VIDEOGRAPHER: We're now on the record.

5 Today's date is December 10, 2019. The time is
6 now 10:13 a.m.

7 This is the video-recorded deposition of Bruce
8 Scott, 30(b)(6) representative for The GEO Group, Inc.,
9 in the matter of Ugochukwu Goodluck Nwauzor, et al.,
10 versus The GEO Group, Inc., pending in the United States
11 District Court, Western District of Washington at
12 Seattle, Case No. 17-cv-05769-RJB.

13 This deposition is at the request of the
14 plaintiff.

15 My name is Lindsey Lewis, your videographer,
16 here with Don McKay, your court reporter. We represent
17 Seattle Deposition Reporters.

18 This deposition is taking place at Schroeter
19 Goldmark & Bender, 810 Third Avenue, Suite 500, Seattle,
20 Washington, 98104.

21 Will counsel please identify and state your
22 appearances for the record.

23 MR. WHITEHEAD: Good morning. Jamal Whitehead
24 on behalf of Mr. Nwauzor and the certified class.

25 MS. ROE: Rebecca Roe with Jamal Whitehead.

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1 MS. MELL: Joan Mell. GEO.

2 Bruce Scott, witness, 30(b)(6).

3 MR. POLOZOLA: My name is Lane Polozola. I am
4 counsel for the State of Washington in a separate
5 consolidated lawsuit, Washington versus GEO.

6 THE VIDEOGRAPHER: Will the court reporter
7 please administer the oath.

8

9 BRUCE A. SCOTT, JR. called as a witness in the
10 above-entitled cause, being
11 first duly sworn, testified
12 as follows:

13

14 E X A M I N A T I O N

15 BY MR. WHITEHEAD:

16 Q. Good morning, Mr. Scott. We met yesterday when
17 I deposed you in your individual capacity. I will
18 introduce myself again, though, for the benefit of the
19 record. I'm Jamal Whitehead. I represent Mr. Nwauzor,
20 as well as Mr. Aguirre-Urbina in their lawsuit against
21 The GEO Group.

22 Mr. Scott, could you please state and spell your
23 name for the record.

24 A. Bruce Arnold Scott, Jr. B-R-U-C-E, A-R-N-O-L-D,
25 S-C-O-T-T, J-R.

1 line item, of barber shop activities for three months,
2 if we knew it was going to be three months. There could
3 be other options that GEO looks at.

4 Q. In terms of the options that GEO would look at
5 in the event of a long-term volunteer worker stoppage,
6 whether it be in the kitchen or any of the other jobs,
7 would one of the considerations be looking to an outside
8 contracting agency to perform the functions that were
9 previously performed by the detainee workers?

10 MS. MELL: Object to the form.

11 THE WITNESS: That could be one of many options
12 that were weighed.

13 MR. WHITEHEAD: Lane, can I see your 314.

14 MR. POLOZOLA: 314.

15 MR. WHITEHEAD: Yes, please.

16 Joan, I'm happy to print off another copy, if
17 you'd like. But Exhibit 314 is the Volunteer Work
18 Program Agreement. This is a copy of it. May I show
19 the witness or would you prefer that we print another
20 copy and check it in as another exhibit?

21 MS. MELL: I'm not sure what you're asking.
22 It's already an exhibit, you're just pulling it out of
23 your exhibit binder?

24 MR. WHITEHEAD: Because we don't have the -- the
25 court reporters did not bring the previous exhibits --

1 contribution in maintaining the Northwest Detention
2 Center?

3 A. Detainees often take very much pride in the work
4 that they do. This is just a way of thanking them for
5 volunteering and working inside the facility, that is on
6 a voluntary basis.

7 Q. And it's an important part of the facility's
8 operations. Correct?

9 A. It covers a number of required standards in the
10 ICE contract and standards. Cleanliness is an important
11 role in any facility, and detainees take great pride in
12 living in a clean facility.

13 Q. Do they play an important role in keeping the
14 Northwest Detention Center clean?

15 A. They're one of many roles that assist in that,
16 but -- again, I can read the sentence. I don't want to
17 read outside the sentence. The sentence says, "We thank
18 you for your important contributions to maintaining this
19 facility." We appreciate the voluntary activities that
20 they do to keep themselves from not being idle and doing
21 the great work that they do.

22 Q. Is it true that GEO assigns detainee workers to
23 individual work details?

24 A. No.

25 Q. How does that work?

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[illegible]

That the foregoing deposition upon oral examination of the witness named herein was taken stenographically before me and transcribed under my direction;

That the witness was duly sworn by me pursuant to
RCW 5.28.010 to testify truthfully;

That the transcript of the deposition is a full,
true and correct transcript to the best of my ability;

That I am neither an attorney for, nor a relative or employee of any of the parties to the action or any attorney or counsel employed by the parties hereto, nor financially interested in its outcome.

I further certify that in accordance with CR 30(e), the witness was given the opportunity to examine, read, and sign the deposition, within 30 days upon its completion and submission, unless waiver of signature was indicated in the record.

Donald W. McKay, RMR, CRR
Washington Certified Court Reporter No. 3237
License effective until: 07/02/2020

